REMARKS

Claims 1-32 are pending in the application and all were rejected in the Office Action mailed January 9, 2008. Claims 1, 11, 15, 21, and 25 have been amended, and claim 3 has been cancelled. Claims 1, 11, 15, 21, and 25 are independent claims. Claims 2 and 4-10, 12-14, 16-20, 22-24, and 26-32 depend, respectively, from independent claims 1, 11, 15, 21, and 25. Applicants respectfully request reconsideration of pending claims 1, 2, and 4-32, in view of the following remarks.

Rejections of Claims

Claims 1-7, 10-12, and 14 were rejected under 35 U.S.C. 102(e) as being anticipated by Zhao (US 2002/0124007). Claims 15-27 and 32 were rejected under 35 U.S.C. 102(e) as being anticipated by Merrill et al. (US 2004/0002943, hereinafter "Merrill"). Claims 8 and 9 were rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao in view of Herschberg et al. (US 2003/0022657, hereinafter "Herschberg"). Claim 13 was rejected under 35 U.S.C. 103(a) as being unpatentable over Zhao in view of Whelan et al. (US 2004/0203593, hereinafter "Whelan"). Claims 28-31 were rejected under 35 U.S.C. 103(a) as being unpatentable over Merrill in view of Herschberg. Applicants respectfully traverse the rejection. Nevertheless, Applicants have amended claims 1, 11, 15, 21, and 25 to clarify the subject matter of the claims.

I. Zhao Does Not Anticipate Claims 1-7, 10-12, And 14

With regard to the anticipation rejections, MPEP 2131 states, "[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California,* 814 F.2d 628, 631 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). MPEP 2131 also states, "[t]he identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

With regard to amended claim 1, Applicants respectfully submit that Zhao does not teach each and every element of Applicants' claim 1, which has been amended to recite "[a] mobile services network for management of service components in an electronic device, the mobile services network comprising: a plurality of regions of data and content in the electronic device; a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device; and wherein each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content."

The Office states that Zhao teaches "...a mobile services network for management of service components in an electronic device, the mobile services network comprising: a plurality of regions of data and content in the electronic device (See page 5, paragraph [0040-0042] and figure 4); a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device (See page 4, paragraph [0033], page 5, paragraph [0044 and page 6, paragraph [0045-0046])." *See* Office action at page 3. Applicants have amended claim 1 to include the features of dependent claim 3, which recited, in part, "...wherein each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content." Applicants now turn to examine the cited portions of the Zhao reference.

Applicants first address the alleged teachings of paragraph [0040] at page 5 of Zhao, which states:

> [0040] It should be understood that device 40 is not limited to having eight elements as described herein above and shown in FIG. 4. Depending of the application, some of the elements in device 40 are optional. For example, the device communication route (Dev_Rt) is optional if Intranet 16 has only one communication protocol, e.g., RS-485. The

> device security code (Dev_Sec), the device client access count (Dev_Cnt), the device property mapping frequency (Dev_MF), and device data packet sequence (Dev_Seq) may also be optional in device 40 of device index table 32.

The portion of Zhao shown above simply teaches that the data structure "device 40" of Zhao may have a number of elements, and provides examples of such elements. This portion of Zhao, which was specifically selected by the Office as being particularly relevant to Applicants' claim 1, does not, however, provide any teaching with respect to "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Applicants' note that although Zhao teaches at paragraph [0006] that "...management server 12 might comprise a plurality of individual computers or servers...", Zhao does not teach or suggest that a particular one of the plurality of individual servers access or manage a particular one of a plurality of regions of data and content in one of the "intelligent devices" of Zhao, in accordance with Applicants' amended claim 1. Therefore, Applicants respectfully submit that neither paragraph [0006] nor paragraph [0040] of Zhao teach or suggest at least this aspect of Applicants' amended claim 1.

Next, Applicants turn to cited paragraph [0041] of Zhao, which recites:

> [0041] FIG. 5 illustrates a device property table 50 in database 30 of network server 20 in accordance with the present invention. Device property table 50 can be any of device property tables 35A, 35B, . . . , 35N in database 30. By way of example, device property table 50 represents device property tables 35A in database 30 for characterizing intelligent device 15A in Intranet 16. Device property table 50 lists objects associated with intelligent device 15A. For example, if intelligent device 15A is a color television, the associated objects may include television channel

> frequencies, brightness, color, tint, volume, bass level, treble level, etc.

The portion of Zhao shown above simply discloses that a "device property table 50" of Fig. 5 may list a variety of objects associated with a device. For a device example of a television, Zhao explains that such objects may be channel frequencies, brightness, color, and tint, as a few examples. The portion of Zhao shown above does not, however, teach or suggest, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Therefore, Applicants respectfully submit that paragraph [0041] of Zhao fails to teach or suggest at least this aspect of Applicants' amended claim 1.

Applicants next address the alleged teachings of Zhao at paragraph [0042], which states:

> [0042] As shown in FIG. 5, device property table 50 includes a device digital identifier (Dev_ID). Preferably, the device digital identifier (Dev_ID) in device property table 50 is the same as that in device 40 in device index table 32. The device digital identifier establishes the one to one correspondences between device 40 in device index table 32 and device property table 50. Device property table 50 preferably also includes a device descriptor (Dev_DSP) that describes byte length of the address code of intelligent device 15A and data transmission mode, e.g., higher byte first or lower byte first, between network server 20 and intelligent device 15A. Device property table 50 further includes a device object number (Dev_Obj_NUM) that indicates the number of objects associated with intelligent device 15A. For each object, device property table 50 preferably includes an object name (Dev_Obj_1, Dev_Obj_2, Dev_Obj_i). Referring back to FIG. 3, the object names in device property table 35A point to corresponding object

> property tables (A1, A2, . . . , Ai) in database 30 associated with intelligent device 15A. Likewise, the object names in device property table 35B point to corresponding object property tables (B1, B2, . . . , Bj) in database 30 associated with intelligent device 15B. Further, the object names in device property table 35N point to corresponding object property tables (N1, N2, . . . , Nk) in database 30 associated with intelligent device 15N.

This portion of Zhao merely describes the various data elements of a "device property table 50" according to Zhao, which may include, for example, a device digital identifier "Dev_ID' and a device descriptor "Dev_DSP". However, this portion of Zhao does not teach or suggest, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Therefore, Applicants respectfully submit that paragraph [0042] of Zhao also fails to teach at least this aspect of Applicants' amended claim 1.

The Office also cited Fig.4 of Zhao in the rejection of claim 1, which Applicants have reproduced below:

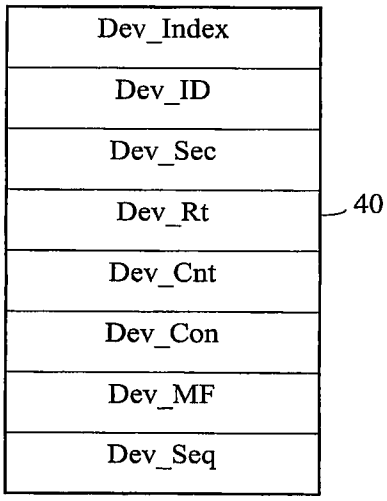

FIG. 4

The illustration shown above, which Zhao describes as "...a device index table in a database..", simply shows a variety of data elements. Applicants respectfully submit , however, that this portion of Zhao does not teach or suggest, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Therefore, Applicants respectfully submit that Fig. 4 of Zhao fails to teach at least this aspect of Applicants' amended claim 1.

The Office also identifies paragraph [0033] of Zhao as teaching elements of Applicants' claim 1. Paragraph [0033] of Zhao is shown below:

> [0033] For each of intelligent devices 15A-15N, database 30 includes object property tables describing the objects associated therewith. By way of example, intelligent device 15A, 15B, . . . , and 15N have i, j, . . . , and k, respectively, objects associated therewith, with i, j, . . . , and k being any integers. Database 30 includes object property tables A1, A2, . . . , and Ai describing the objects associated with intelligent device 15A. Device property table 35A

> includes address codes pointing to object property tables A1, A2, . . . , and Ai. Likewise, database 30 includes object property tables B1, B2, . . . , and Bj describing the objects associated with intelligent device 15B. Device property table 35B includes address codes pointing to object property tables B1, B2, . . . , and Bj. Further, database 30 includes object property tables N1, N2, . . . , and Nk describing the objects associated with intelligent device 15N. Device property table 35N includes address codes pointing to object property tables N1, N2, . . . , and Nk. Preferably, device property table 35A and object property tables A1-Ai are mapped from intelligent device 15A. Likewise, device property table 35B and object property tables B1-Bj are preferably mapped from intelligent device 15B. Further, device property table 35N and object property tables N1-Nk are preferably mapped from intelligent device 15N.

The portion of Zhao shown above describes the contents of a "database 30", illustrated by Fig. 3 of Zhao, which may include "device property tables" whose elements point to "object property tables" for a number of "intelligent devices". Nothing in paragraph [0033] of Zhao, however, teaches or suggests, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Therefore, Applicants respectfully submit that paragraph [0033] of Zhao fails to teach at least this aspect of Applicants' amended claim 1.

Applicants now turn to paragraph [0044] of Zhao, also cited by the Office, which states:

> [0044] FIG. 6 illustrates an object property table 60 in database 30 of network server 20 in accordance with the present invention. Object property table 60 can be any of object property tables A1-Ai, B1-Bj, . . . , and N1-Nk describing objects associated with respective intelligent

> devices 15A, 15B, . . . , and 15N. By way of example, object property table 60 represents object property tables A1 in database 30 for describing an object associated with intelligent device 15A in Intranet 16.

In paragraph [0044], Zhao simply describes the contents of an "object property table 60". However, this segment of Zhao fails to set forth any teaching or suggestion of, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Therefore, Applicants respectfully submit that paragraph [0044] of Zhao also fails to teach at least this aspect of Applicants' amended claim 1.

Next, Applicants review the alleged teachings of paragraph [0045] of Zhao, which recites:

> [0045] As shown in FIG. 6, object property table 60 includes a description section 62 comprised of an object type description (Obj_TYPE), an object address pointer (Obj_ADDR), an object data attribution (Obj_ATTR1 and Obj_ATTR2), an object data size (Obj_SIZE), an object name size (Obj_NAMESIZE), and an object name (Obj_NAME). The byte length and the function of each term in description section 62 are described in FIG. 7 by way of example. In a preferred embodiment, the object types include constant, read only variable, write only variable, read and write variable, event without parameter, event with read only parameter, event with write only parameter, event with read and write parameter, read only file, write only file, read and write file, and function. Depending on the object type, Obj_ADDR in description section 62 can point to different addresses. Obj_NAME serves to identify the object associated with object property table 60. Obj_NAME can be various types of data such as, for example, binary, ASCII, UNICODE, etc. It should be noted that Obj_ADDR is optional in object property table 60.

In this passage, Zhao teaches that the "object property table 60" includes a variety of elements, including an "object type description (Obj_TYPE)" and an "object address pointer (Obj_ADDR)". Nothing in this portion of Zhao, however, teaches or suggests, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Accordingly, Applicants respectfully submit that paragraph [0045] of Zhao fails to teach at least this aspect of Applicants' amended claim 1.

Applicants now move to address paragraph [0046] of Zhao, which recites:

> [0046] Object property table 60 also includes a data section 64 comprised of a plurality of data fields, including an event control field (EC), a DATA_FIELD_1, and a DATA_FIELD_2. However, object property table 60 in accordance with the present invention is not limited to establishing three data fields as shown in FIG. 6. Depending on the applications of intelligent device 15A, any number of data fields, e.g., one, two, four, five, etc., can be established in data section 64 of object property table 60. The data types of DATA_FIELD_1 and DATA_FIELD_2 include unsigned and signed binary, unsigned and signed word, unsigned and signed double word, floating point data, ASCII, UNICODE, etc.

Applicants respectfully submit that this portion of Zhao simply describes various elements of an "object property table 60", and possible data field types. However, there is nothing in this segment of Zhao that teaches or suggests, at least, "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the

plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", in accordance with amended claim 1. Accordingly, Applicants respectfully submit that paragraph [0046] of Zhao again fails to teach at least this aspect of Applicants' amended claim 1.

In the rejection of the features of claim 3, which are now incorporated in amended claim 1, the Office identified paragraphs [0034] and [0035] as teaching "...wherein each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...." Applicants respectfully disagree. Applicants first address the alleged teachings of paragraph [0034] of Zhao, which states:

> [0034] FIG. 4 illustrates the structure of a device 40 in device index table 32 in database 30 of network server 20 in accordance with the present invention. Device 40 can be any of entries DEV_A, DEV_B, . . . , and DEV_N in device index table 32 shown in FIG. 3. By way of example, device 40 is entry DEV_A in device index table 32 corresponding to intelligent device 15A in Intranet 16. Device 40 preferably has eight elements: device index (Dev_Index), device digital identifier (Dev_ID), device security code (Dev_Sec), device communication route (Dev_Rt), device client access count (Dev_Cnt), device connection status (Dev_Con), device property mapping frequency (Dev_MF), and device data packet sequence (Dev_Seq).

Applicants respectfully submit that this portion of Zhao describes elements of a data structure "Device 40" of Fig. 4, which Applicants previously addressed above. This portion of Zhao does not, however, teach or suggest "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", as recited by Applicants' amended claim 1. The Applicants'

respectfully note that the Office failed to provide any explanation how and why this portion allegedly teaches the features of Applicants claim 3, now incorporated in Applicants' amended claim 1. Applicants respectfully submit that paragraph [0034] of Zhao does not teach or suggest at least this aspect of Applicants' amended claim 1.

Finally, Applicants address paragraph [0035] of Zhao, which states:

> [0035] The device index (Dev_Index) preferably lists an index to intelligent device 15A, in Intranet 16. In a preferred embodiment, the Dev_Index (Dev_Index) stores the name of intelligent device 15A. The device digital identifier (Dev_ID) stores a digital identifier uniquely identifies intelligent device 15A. Typically, the device digital identifier is set by the manufacturer of intelligent device 15A. In order to access intelligent device 15A, a client is preferably required to provide a security code matching the device security code (Dev_Sec) in device 40 of device index table 32. The device communication route (Dev_Rt) preferably specifies device communication protocol, port, address or telephone number, and communication speed for intelligent device 15A.

The passage from Zhao shown above simply describes the contents of some of the data elements of the data structure "Device 40" shown in Fig. 4 of Zhao. While the "Device 40" data structure does include a "Dev_Sec" data element, which Zhao describes as a "device security code", Zhao does not, however, teach or suggest "...a plurality of server-side components, each of the server-side components managing at least one particular region of the plurality of regions of data and content in the electronic device;..." where "...each of the plurality of regions of data and content in the electronic device are adapted to employ a security mechanism enabling a particular one of the plurality of server-side components to access or manage a particular one of the plurality of regions of data and content...", as recited by Applicants' amended claim 1. Again, Applicants respectfully note that the Office fails to explain how and why this portion allegedly teaches the features of Applicants claim 3, which have been incorporated in Applicants' amended claim 1. Therefore, Applicants respectfully submit that paragraph [0035] of Zhao does not teach or suggest at least this aspect of Applicants' amended

claim 1.

In addition, Applicants have reviewed Zhao, and have been unable to identify elements of Zhao that teach or suggest all of the aspects of Applicants' amended claim 1. If Applicants have inadvertently overlooked such teachings, Applicants respectfully request that the Office clearly and specifically identify such teachings, explaining in detail how the cited elements of Zhao teach or suggest each and every element of Applicants' amended claim 1.

Based at least upon the above, Applicants respectfully submit that Zhao does not teach or suggest each and every element of Applicants' amended claim 1, as required by M.P.E.P. §102(e), that Zhao does not anticipate Applicants' amended claim 1, and that amended claim 1 is allowable over Zhao. Because claims 2 and 4-9 depend from claim 1, Applicants respectfully submit that Zhao fails to anticipate those claims as well, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 1-7 and 10 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

With regard to claim 11, Applicants respectfully submit that claim 11 has been amended to recite "[a] mobile services network comprising an electronic device having access to a plurality of services, and wherein the electronic device being adapted to be managed remotely, the mobile services network comprising: a management server for managing access to a plurality of services associated with the electronic device; a plurality of service management repositories for management of associated service components installed in non volatile memory of the electronic device; and wherein access to each of the plurality of associated service components by a corresponding one of the plurality of service management repositories is enabled by a corresponding security mechanism in the electronic device."

Applicants respectfully submit that amended claim 11 as amended recites features similar to those set forth in amended claim 1, which Applicants have shown is allowable over Zhao. Applicants believe that Zhao does not anticipate amended claim 11, and that amended claim 11 is allowable over the Zhao reference, for at least those same reasons. Further, Applicants respectfully submit that because Zhao fails to

anticipate amended claim 11, Zhao also does not anticipate claims 12-14, which depend from amended claim 11, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 11, 12, and 14 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

II. Merrill Does Not Anticipate Claims 15-27 And 32

With regard to claim 15, Applicants respectfully submit that the Office has failed to show where Merrill teaches or suggests each and every element of Applicants' claim 15, which Applicants have amended to recite "[a] mobile network for updating firmware and software in an electronic device, the mobile network comprising: a management server facilitating management of firmware and software in the electronic device; a corporate virtual user group management server for corporate virtual user group management; and a corporate software repository being employed for corporate virtual user group management and for distributing corporate software and corporate data to the electronic device."

The Office states that Merrill teaches "..."a mobile network capable of updating firmware and software in an electronic device, the mobile network comprising: a management server facilitating management of firmware and software in the electronic device (See paragraph [0051]); a corporate virtual user group management server for corporate user virtual group management (See page 6, paragraph [0099]); and a corporate software repository being employed for corporate user virtual group management and for distributing corporate software and corporate data to the electronic device (See page 7, paragraph [0109] and page 8, paragraph [0111-012])." *See* Office action at page 6. Applicants respectfully disagree. Applicants first address Merrill at paragraph [0051], which recites:

> [0051] FIG. 4 shows logical components of system management framework 300 in more detail. Management server system 302 includes an inventory and discovery component 402 and distribution component 404. Inventory and discovery component 402 receives discovery data records from multiple mobile clients 304 as one or more electronic files 406 for purposes of asset management.

> Inventory and discovery component 402 is responsible for identifying new offerings 408 since a last successful poll by the corresponding client. The data discovery record includes at least an indication of when, if at all, a last successful pull of the targeted resource (e.g., indicated via an embedded URL) was performed.

Applicants respectfully submit that although the cited portion of Merrill shown above describes various elements of Fig. 4 of Merrill, this portion of Merrill fails to teach or suggest "...a management server facilitating management of firmware and software in the electronic device." The cited portion of Merrill fails to even mention firmware or software, and does not teach or suggest a management server that "...facilitates management of firmware and software." Indeed, neither the cited portion of Merrill shown above, nor any other portion or figure of Merrill teaches anything with respect to firmware, to the management of firmware, or to a management server that facilitates management of firmware. Applicants respectfully submit that the Office fails to set forth any explanation of how the cited passage teaches this feature of Applicants' claim 15. Therefore, Applicants respectfully submit that the Office has filed to show how and why paragraph [0051] of Merrill teaches or suggests at least this aspect of Applicants' amended claim 15.

Applicants now turn to address the alleged teachings of Merrill at paragraph [0099], which recites:

> [0099] In an action 516, to ensure that mobile client application downloads remain secure, file verification and user authorization component 434 checks the digital signature (i.e., the claimed identity) of the received download instructions against one or more trusted source(s) from which download instructions are considered to be secure and reliable. Such trusted sources are stored in TSL 428. For instance, the TSL is a listing of trusted application delivery servers and their public keys. Scheduling component 308 exposes one or more interfaces via scheduler API 430 to update and otherwise manage contents of the TSL. An exemplary scheduler API 430 is shown below in APPENDIX A.

The portion of Merrill at paragraph [0099] appears to teach that a "file verification and user authorization component 434" in a "mobile client 304" checks that received "download instructions" are from a trusted source, using a "trusted source list (TSL) 428" of trusted delivery servers and their public keys. However, nothing in the cited passage from Merrill shown above makes any mention of "...a corporate virtual user group management server for corporate user virtual group management...", as asserted by the Office. In fact, Merrill taken in its entirety fails to teach anything with respect to the management of "user groups" in general, let alone the management of a "virtual user group", and accordingly fails to teach anything regarding a server for such user group management. Applicants respectfully submit that the Office fails to set forth any explanation of how and why the cited passage teaches this feature of Applicants' claim 15. Therefore, Applicants respectfully submit that the Office has failed to show how and why paragraph [0099] of Merrill teaches or suggests at least this aspect of Applicants' amended claim 15.

Next, Applicants address the teachings of paragraph [0109] of Merrill, which states:

> [0109] FIGS. 7-10 show aspects of an exemplary user interface (UI) 700 presented by a client computing device such as mobile client 304 to perform application delivery and configuration of the computing device. In particular, FIG. 7 illustrates a portion of the UI for a user to request new offerings 408 from management server 302. Download icon 702, when selected by a user, causes the scheduling component to send a data discovery record 406 as described above to the management server. Subsequent to submitting a query to obtain a list of new offerings, bubble menu 704 entitled "Download request", indicates to the user that the data discovery request has been sent to the management server and further indicates that a response from the server is pending.

The portion of Merrill shown above merely describes the details of a "user interface 700" displayed by a "mobile client 304" for application delivery and configuration, and that a user may select an icon on the "user interface 700" to request

"new offerings 408" from a "management server 302". The passage from Merrill shown above, however, does not teach or suggest "...a corporate software repository being employed for corporate virtual user group management and for distributing corporate software and corporate data to the electronic device...", as asserted, for at least the reasons set forth above. Applicants respectfully submit that the Office has failed to specifically identify the elements of Merrill that teach Applicants' "corporate software repository" and "corporate virtual user group", and to provide any explanation of how and why the cited passage teaches or suggests "...a corporate software repository being employed for corporate virtual user group management and for distributing corporate software and corporate data to the electronic device...." Therefore, Applicants respectfully submit that the Office has failed to show where Merrill teaches or suggests at least this aspect of Applicants' amended claim 15.

Based at least upon the above, Applicants respectfully submit that Merrill fails to teach each and every element of Applicants' amended claim 15, "...in as complete detail as is contained in the ... claim...", as required by M.P.E.P. §2131, that the Office has failed to establish a *prima facie* case of anticipation, and that Merrill does not anticipate claim 15, or claims 16-20, that depend therefrom. Accordingly, Applicants respectfully request that the rejection of claims 15-19 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

With regard to claim 21, Applicants respectfully submit that Merrill does not teach or suggest each and every element of Applicants' claim 21, which recites "[a] method of managing a corporate data segment in an electronic device, the method comprising: retrieving corporate software and corporate data from a corporate data repository and facilitating retrieval via a corporate virtual user group management server; storing retrieved corporate software and corporate data in a corporate data segment of the electronic device; retrieving rights to access or execute corporate software and corporate data from a digital rights management server; updating the corporate data segment; wherein the electronic device comprises a plurality of logically separate data segments; and wherein access to each of the plurality of data segments by a

corresponding one of a plurality of data repositories is enabled by a corresponding security mechanism in the electronic device."

The Office states that Merrill teaches "...a method of managing a corporate data segment in an electronic device, the method comprising: retrieving corporate software and corporate data from a corporate data repository and facilitating retrieval via a corporate virtual user group management server (See paragraph [0051]); storing retrieved corporate software and corporate data in a corporate data segment of the electronic device (See paragraph [0062]); retrieving rights to access or execute corporate software and corporate data from a digital rights management server (See paragraph [0099-0100]); and updating the corporate data segment (See paragraph [0026])." *See* Office action at page 7. Applicants respectfully disagree.

Applicants first turn to the alleged teachings of Merrill at paragraph [0051], which states:

> [0051] FIG. 4 shows logical components of system management framework 300 in more detail. Management server system 302 includes an inventory and discovery component 402 and distribution component 404. Inventory and discovery component 402 receives discovery data records from multiple mobile clients 304 as one or more electronic files 406 for purposes of asset management. Inventory and discovery component 402 is responsible for identifying new offerings 408 since a last successful poll by the corresponding client. The data discovery record includes at least an indication of when, if at all, a last successful pull of the targeted resource (e.g., indicated via an embedded URL) was performed.

Applicants respectfully submit that although the cited portion of Merrill shown above describes various elements of Fig. 4 of Merrill, this portion of Merrill fails to teach or suggest "...retrieving corporate software and corporate data from a corporate data repository and facilitating retrieval via a corporate virtual user group management server." The cited portion of Merrill fails to mention retrieving software and data from a management server. In addition, Merrill fails to say anything about a "user group management server". In fact, nothing in Merrill discloses anything with regard to management of user groups. Instead, the cited portion of Merrill teaches that "Inventory

& Discovery component 402" receives "discovery data records" from multiple "mobile clients 304" for purposes of asset management. Applicants respectfully submit that the Office has failed to set forth any explanation of how and why the cited passage teaches the features of Applicants' claim 21. Therefore, Applicants respectfully submit that the Office has failed to show how and why paragraph [0051] of Merrill teaches or suggests at least this aspect of Applicants' amended claim 21.

Applicants now turn to the alleged teachings of Merrill at paragraph [0062], which recites:

> [0062] The mobile client device 304 also has program memory 424 into which downloaded applications are installed, a database or other data structure 426 in which client device 304 maintains or caches an offering list indicating applications or packages that have already been made available to the client device through previous interactions with management server 302, and a trusted source list ("TSL") 428 for authenticating download instructions 410 received from management server 302. The offering list is available for presentation to a user of the remote client independent of any connection to the management server. The remote client is configured to automatically remove an offering from the offerings list responsive to download and installation of the offering onto the remote client.

The portion of Merrill shown above simply discloses that "mobile client device 304" has "program memory 424", a "database or other data structure 426" that holds an "offering list", and a "trusted source list (TSL) 428" for authenticating "download instructions". Applicants respectfully submit that paragraph [0062] does not, however, teach or suggest, at least, "...storing retrieved corporate software and corporate data in a corporate data segment of the electronic device;..." where "...the electronic device comprises a plurality of logically separate data segments; and wherein access to each of the plurality of data segments by a corresponding one of a plurality of data repositories is enabled by a corresponding security mechanism in the electronic device...", as recited by amended claim 21.

Applicants respectfully submit that Merrill fails to teach that the "mobile client device 304" comprises "a plurality of logically separate data segments", and also fails to teach or suggest a "plurality of data repositories". In addition, Merrill fails to teach that a corresponding one of the plurality of data repositories is enabled to access a data segment in the "mobile electronic device 304", by a corresponding security mechanism in the "mobile electronic device 304", in accordance with Applicants' amended claim 21. Therefore, Applicants respectfully submit that Merrill fails to teach or suggest at least these aspects of Applicants' amended claim 21.

Based at least upon the above, Applicants respectfully submit that Merrill fails to teach each and every element of amended claim 21, as required by M.P.E.P. §2131, that a prima facie case of anticipation has not been established, and that the rejection of claim 21 under 35 U.S.C. §102(e) cannot be maintained.

Therefore, Applicants believe that amended claim 21 is allowable, for at least the reasons set forth above. Applicants respectfully submit that claims 22-24 depend from claim 21, and that Merrill fails to anticipate those claims as well, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 21-24 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

With regard to claim 25, Applicants respectfully submit that the Office has failed to show where Merrill teaches or suggests each and every element of claim 25, which has been amended to recite "[a] mobile services network for managing firmware and software in an electronic device, the mobile services network comprising: a plurality of management servers for managing different logical segments of non-volatile memory of the electronic device; and the electronic device comprising non-volatile memory being logically segmented into a plurality of segments with a different one of the plurality of management servers associated with each of the plurality of segments."

The Office states that Merrill teaches "...a mobile services network for managing firmware and software in an electronic device, the mobile services network comprising: a plurality of management servers for managing different logical segments of non-volatile memory of the electronic device (See paragraph [0006]); and the electronic

device comprising non-volatile memory being logically segmented into a plurality of segments with a different one of the plurality of management servers associated with each of the plurality of segments (See page 4, paragraph [0033], page 5, paragraph [0044 and page 6, paragraph [0045-0046])." *See* Office action at page 8. Applicants respectfully disagree.

Initially, Applicants respectfully point out what appear to be errors in the passages from Merrill as cited above. Applicants note that the citations shown above for Merrill appear to simply be copies of the citations used for the Zhao reference in the rejection of Applicants' claim 1. Applicants are unable to determine what teachings of Merrill are actually being referenced, because the citations are inconsistent in their identification of the relevant teachings. Specifically, Applicants respectfully submit that cited paragraph [0033] of Merrill is not on page 4 (it begins on page 2), that paragraph [0044] is not on page 5 of Merrill (it appears on page 3), and that paragraphs [0045-0046] of Merrill are not on page 6 (these paragraphs appear on page 3). Applicants are left wondering what portions of Merrill are actually alleged to teach the features of claim 25. Applicants respectfully submit that such ambiguous citations by the Office fail to identify where Merrill allegedly teaches "...the electronic device comprising non-volatile memory being logically segmented into a plurality of segments with a different one of the plurality of management servers associated with each of the plurality of segments...", as recited by Applicants' claim 25. Therefore, Applicants respectfully submit that the Office has failed to show where Merrill teaches at least these aspects of Applicants' claim 25.

Applicants now also address the alleged teachings of Merrill at paragraph [0006], which states:

> [0006] Although it is represented as a single device in FIG. 1, management server 12 might comprise a plurality of individual computers or servers, which might be located in close proximity to each other or might be located at various different locations.

Applicants respectfully submit that the cited portion of Merrill shown above simply states that "management server 12" may comprise a plurality of servers. This portion of Merrill does not, however, teach or suggest, at least, "...a plurality of management servers for managing different logical segments of non-volatile memory of the electronic device;...", as recited by Applicants' claim 25. The Office has failed to explain how and why the cited portion of Merrill teaches that the "plurality of servers" that may make up the "management server 12" may manage "...different logical segments of non-volatile memory of the electronic device...." Applicants have reviewed the Merrill reference, and have been unable to find such a teaching. Although Merrill appears to disclose (at paragraph [0006]) that a "management server 12" may comprise a plurality of servers, that statement provides no support for the assertion by the Office that Merrill teaches "...a plurality of management servers for managing different logical segments of non-volatile memory of the electronic device;...." There is nothing in the cited portion of Merrill, nor any other portion or figure of Merrill that teaches or suggests that the servers from the "plurality of servers" manage "different logical segments of non-volatile memory of the electronic device", in accordance with Applicants' claim 25. Therefore, Applicants respectfully submit that the Office has failed to show where Merrill teaches or suggests at least this aspect of Applicants' amended claim 25.

Based at least upon the above, Applicants respectfully submit that Merrill does not teach or suggest each and every element of amended claim 25, as required by M.P.E.P. §2131, that the Office has failed to establish a *prima facie* case of anticipation, and that Merrill does not anticipate amended claim 25.

Therefore, Applicants believe that amended claim 25 is allowable, for at least the reasons set forth above. Applicants respectfully submit that claims 26-32 depend from claim 25, and that Merrill fails to anticipate those claims as well, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 25-27 and 32 under 35 U.S.C. §102(e) be reconsidered and withdrawn.

III. The Proposed Combination Of Zhao And Herschberg Does Not Render Claims 8 and 9 Unpatentable

Applicants respectfully submit that claims 8 and 9 depend from amended claim 1. Applicants believe that amended claim 1 is allowable over Zhao and Herschberg, in that Herschberg fails to overcome the shortcomings of Zhao, for at least the reasons set forth above. Applicants respectfully submit that because amended claim 1 is allowable over the proposed combination of references, claims 8 and 9 are also allowable for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claims 8 and 9 under 35 U.S.C. §103(a) be reconsidered and withdrawn.

IV. The Proposed Combination Of Merrill And Whelan Does Not Render Claim 13 Unpatentable

Applicants respectfully submit that claim 13 depends from amended claim 11. Applicants believe that amended claim 11 is allowable over Merrill and Whelan, in that Whelan fails to overcome the shortcomings of Merrill, for at least the reasons set forth above. Applicants respectfully submit that because amended claim 11 is allowable over the proposed combination of references, claim 13 is also allowable, for at least the same reasons. Accordingly, Applicants respectfully request that the rejection of claim 13 under 35 U.S.C. §103(a) be reconsidered and withdrawn.

V. The Proposed Combination Of Merrill And Herschberg Does Not Render Claims 28-31 Unpatentable

Applicants respectfully submit that claims 28-31 depend from amended claim 25. Applicants believe that amended claim 25 is allowable over Merrill and Herschberg, in that Herschberg fails to overcome the shortcomings of Merrill, for at least the reasons set forth above. Applicants respectfully submit that because amended claim 25 is allowable over the proposed combination of references, claims 28-31 are also allowable, for at least the same reasons. Accordingly, Applicants respectfully request

that the rejection of claims 28-31 under 35 U.S.C. §103(a) be reconsidered and withdrawn.

Conclusion

The Office Action makes various statements regarding claims and the cited references that are now moot in light of the above. Thus, Applicants will not address such statements at the present time. However, the Applicants expressly reserve the right to challenge such statements in the future should the need arise (e.g., if such statements should become relevant by appearing in a rejection of any current or future claim).

Applicants believe that all of claims 1, 2, and 4-32 are in condition for allowance. Should the Examiner disagree or have any questions regarding this submission, the Applicant invites the Examiner to contact the undersigned at (312) 775-8000 for an interview.

A Notice of Allowability is courteously solicited.

Respectfully submitted,

Date: June 3, 2008

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